

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JANE DOE I, individually and on behalf of)
All others similarly situated, JANE DOE 2,)
individually and on behalf of all others)
similarly situated, JANE DOE 3 individually)
and on behalf of others similarly situated)
JANE DOE 4 individually and on behalf of)
Others similarly situated, JANE DOE 4)
individually and on behalf of others similarly)
situated, JANE DOE 5 individually and on)
behalf of others similarly situated, JANE)
DOE 6 individually and on behalf of others)
similarly situated.)
PLAINTIFFS,)
)
)
)
)
V.)
)
)
GOVERNMENT OF THE UNITED)
STATES VIRGIN ISLANDS ET AL.)
DEFENDANTS.)
)

**INDIVIDUAL AND CLASS ACTION
SECOND AMENDED COMPLAINT**

23-CV-10301- AS

ACTION FOR DAMAGES

ANSWER TO PLAINTIFF'S SECOND AMENDED COMPLAINT

COMES the Defendant Vincent F. Frazer, Pro se, and files the Answer to the Plaintiffs second amended complaint. Pro se Defendant responds to the allegations of the second amended complaint and states:

1. Defendant NEITHER ADMITS OR DENIES the allegations stated in paragraph 1 of the Plaintiffs amended complaint.
 2. Defendant DENIES each and every allegation stated in paragraphs 2 to 13 of the Plaintiffs Amended complaint.

3. Defendant DENIES each and every allegation stated in paragraphs 14 to 38 of the Plaintiffs' amended complaint.
4. Defendant Neither ADMITS OR DENIES the allegations stated in paragraphs 39 to 43 of the Plaintiffs' amended complaint.
5. Defendant DENIES each and every allegation stated in paragraph 44 of the Plaintiffs' amended complaint.
6. Defendant ADMIT to each and every allegation stated in paragraphs 45 to 46 of the Plaintiffs' amended complaint.
7. Defendant ADMIT to the allegation stated in paragraph 47 of the Plaintiffs' amended complaint.
8. Defendant DENIES each and every allegation stated in paragraph 48 of the Plaintiffs' amended complaint.
9. Defendant ADMIT to the allegation stated in paragraph 49 of the Plaintiffs' amended complaint.
10. Defendant Lack sufficient information to ADMIT OR DENY the allegations stated in paragraph 50 of the Plaintiffs' amended complaint.
11. Defendant DENIES each and every allegation stated in paragraphs 51 to 58 of the Plaintiffs' amended complaint.
12. Defendant Lacks Sufficient Information to ADMIT OR DENY the allegation stated in paragraph 59 of the Plaintiffs' amended complaint.
13. Defendant DENIES the allegation that Epstein had a growing relationship with USVI officials as part of his venture as alleged in paragraph 60 of the Plaintiff's amended complaint.

14. Defendant Lacks sufficient information to ADMIT OR DENY the allegations stated in paragraph 61 of the Plaintiffs' amended complaint.
15. Defendant DENIES any allegation that Frazer was a co-conspirator in any network of Epstein's illegal or legal activities. Defendant Lacks sufficient information to ADMIT or DENY any other allegation stated in paragraph 62 of the Plaintiffs' complaint.
16. Defendant lacks sufficient information to ADMIT OR DENY the allegations stated in paragraph 63 of the Plaintiffs' amended complaint.
17. Defendant lacks sufficient information to ADMIT OR DENY the allegations stated in paragraph 64 of the Plaintiffs' amended complaint.
18. Defendant DENIES each and every allegation stated in paragraph 65 of the Plaintiffs' amended complaint.
19. Defendant lacks sufficient information to ADMIT OR DENY the allegation stated in paragraph 66 to 70 of the Plaintiffs' amended complaint.
20. Defendant DENIES each and every allegation stated in paragraphs 71 to 84 of the Plaintiffs' amended complaint.
21. Defendant lacks sufficient information to ADMIT OR DENY the allegations stated in paragraphs 85 and 86 of the Plaintiffs' amended complaint.
22. Defendant DENIES each and every allegation stated in paragraphs 87 to 97 of the Plaintiffs' amended complaint.
23. Defendant lacks sufficient information to ADMIT OR DENY the allegations in paragraph 98 of the Plaintiffs' amended complaint.
24. Defendant DENIES each and every allegation stated in paragraphs 99 to 104 of the Plaintiffs' amended complaint.

25. Defendant lacks sufficient information to ADMIT OR DENY the allegations stated in paragraphs 105 to 107 of the Plaintiffs' amended complaint.
26. Defendant DENIES each and every allegation stated in paragraphs 108 to 110 of the Plaintiffs' amended complaint.
27. Defendant lack sufficient information to ADMIT OR DENY the allegations stated in paragraphs 111 to 113 of the Plaintiffs' amended complaint.
28. Defendant DENIES each and every allegation stated in paragraphs 114 to 122 of the Plaintiffs' amended complaint.
29. Defendant lacks sufficient information to ADMIT OR DENY the allegations stated in paragraphs 123 to 126 of the Plaintiffs' amended complaint.
30. Defendant DENIES each and every allegation stated in paragraphs 127 to 133 of the Plaintiffs' amended complaint.
31. Defendant lacks sufficient information to ADMIT OR DENY the allegations stated in paragraphs 134 to 151 of the Plaintiffs' amended complaint.
32. Defendant DENIES each and every allegation stated in paragraphs 152 to 175 of the Plaintiffs' amended complaint.
33. Defendant lacks sufficient information to ADMIT OR DENY the allegations stated in paragraph 176 of the Plaintiffs' amended complaint.
34. Defendant DENIES each and every allegation stated in paragraphs 177 and 178 of the Plaintiffs' amended complaint.

CLASS ACTION ALLEGATIONS

35. Defendant DENIES each and every allegation stated in paragraphs 179 to 190 of the Plaintiffs' amended complaint.

CAUSES OF ACTION

36. Defendant DENIES each and every allegation stated in paragraphs 191 to 213 of the Plaintiffs' amended complaint.
37. Defendant DENIES each and every allegation stated in paragraphs 215 to 240 of the Plaintiffs' amended complaint.
38. Defendant DENIES each and every allegation stated in paragraphs 241 to 259 of the Plaintiffs' amended complaint.
39. Defendant DENIES the allegations stated in paragraphs 261 to 265 but neither admit or deny the statement of the statutes in the Plaintiffs' amended complaint.
40. Defendant DENIES each and every allegation stated in paragraphs 266 to 299 of the Plaintiffs' amended complaint.
41. Defendant DENIES the allegations in paragraphs 301 to 315 that Defendant was a co-conspirator with Epstein in his illegal activities; and Defendant lacks sufficient information to ADMIT OR DENY to the specific activities of Epstein.
42. Defendant DENIES each and every allegation stated in paragraphs 316 to 322 of the Plaintiffs' amended complaint.
43. Defendant ADMITS to the allegations stated in paragraphs 323 to 327 of the Plaintiffs' amended complaint.
44. Defendant DENIES each and every allegation stated in paragraphs 328 to 347 of the Plaintiffs' amended complaint.

AFFIRMATIVE DEFENSES

Defendant asserts the following as Affirmative Defenses to the Plaintiffs' allegations:

1. This Court lacks subject matter jurisdiction over this matter.
2. At all relevant times, the Defendant Frazer was acting within the scope of his statutory duties as Attorney General of the United States Virgin Islands.
3. Defendant Frazer has immunity for acts that were within the scope of his statutory duties as Attorney General of the United States Virgin Islands.
4. Plaintiff fails to state a claim for which relief could be granted.
5. The Plaintiffs, Jane Does 1 to 6 all knew Jeffery Epstein, his character and his reputation and therefore they assumed the risk of associating and traveling with Epstein.
6. The Plaintiffs, Jane Does 1 to 6 were well aware of the character and reputation of Jeffery Epstein and they were contributorily negligent.

WHEREFORE, the Defendant Frazer request a judgment as follows:

- a. Dismiss the Plaintiffs complaint with prejudice.
- b. Award the Defendant cost and attorney fees;
- c. Award the Defendant such other relief as to the Court is just and proper.

Date: July 5, 2024

/s/Vincent F. Frazer
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